

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

KRISTINE LYNCH

§
§
§
§
§

No. 4:20CR

Judge

140

Jordan

FILED

INDICTMENT

JUN 10 2020

The Grand Jury Charges:

COUNT ONE

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

Violation: 18 U.S.C. 1344 (Bank Fraud)

The Scheme

1. Kristine Lynch was employed at North Texas Medical Center (NTMC) from approximately May 2006 to August 2017. During her employment period she had the ability to issue checks on behalf of NTMC in order to replenish the automated teller machine. Lynch was to follow a procedure that ensured the legitimacy of the check.
2. Beginning around June 2014, Lynch went outside the proper procedure in order to print multiple checks. Lynch would print checks, or request to have checks printed, for the supposed purpose of replenishing the automated teller machine located at NTMC. Lynch sometimes had another employee print checks or request checks to be printed. Lynch would then take the fraudulent checks, or have another employee take the fraudulent checks, to a Chase bank located in the Eastern District of Texas where the account for NTMC was located. Lynch, or another employee at her direction, then cashed the checks.

3. The funds from the fraudulent checks, or a vast majority of them, were not placed in the automated teller machine but was taken by Lynch for her own personal use.

4. Beginning on or about June 1, 2014 and continuing through on or about August 15, 2017, in the Eastern District of Texas, and elsewhere, the Defendant, **Kristine Lynch**, knowingly executed the scheme or artifice described in paragraphs 1 through 3 to obtain the monies or funds by or under the control of Chase bank by means of material or false or fraudulent pretenses, representations or promises in violation of Title 18 United States Code section 1344.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Criminal Forfeiture Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)

Kristine Lynch may have acquired property constituting, or derived from, proceeds obtained directly or indirectly from the commission of the offense charged in this information. All such proceeds are subject to forfeiture by the government.

A TRUE BILL,



FOREMAN OF THE GRAND JURY

STEPHEN J. COX
UNITED STATES ATTORNEY



WILLIAM R. TATUM
Assistant United States Attorney

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:20CR
	§	Judge
KRISTINE LYNCH	§	

NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. § 1344

Penalty: Imprisonment for a term of not more than 30 years, a fine not to exceed \$1,000,000, or both; supervised release of not more than 5 years.

Special Assessment: \$100.00 per count